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I am writing this letter to request a deviation/exception to 14 CFR 65.91(c)(2) that would allow authorization for me to take the Inspection Authorization (IA) test. I feel this deviation could be granted because of the impacts, disruptions and consolidations in the airline industry caused for the most part by COVID-19.

I have held the airframe and power plant certificate since 1995. I have been actively engaged, without a break in service, as an airframe and power plant mechanic since March, 2002. After nearly 30 successful years in the aviation industry, I was laid off in mid-November, 2020. At the time I was working for Grant Aviation. Upon my lay off I had held the Inspection authorization (IA) for approximately 16 years.

The layoffs at Grant were the end result of the collapse of Corvus, the largest Alaskan airline holding group (RAVN), Grant aviation's growth from this collapse triggered a partial sell off, establishing a new majority owner. The new owners laid off much of the management team, including myself.

At the time of the March 2021 Inspection Authorization renewal, I was unable to show that I was actively engaged in aviation maintenance. Because of COVID, there were no aviation jobs available in my area, so I was forced to surrender my authorization. All of the airlines in my community have closed their doors and only one small passenger carrier based out of Juneau was serving Sitka Alaska.

I have recently taken a job as the Director of Maintenance for Taquan Air in Ketchikan (Certificate TQ0A509J), Alaska. I am actively engaged once again. I have made an application to our PMI requesting to be authorized to take the Inspection authorization test. I was denied. I was told the denial was due to not having been actively engaged for at least the two-year period before my application.

For the past three years I have been actively engaged for 30 out of the 36 months. I am currently working in the aviation industry for Taquan Air in Ketchikan, Alaska as the Director of Maintenance. There was a six month period that I was forced to be inactive. This inactivity was within the last 2 years. This was the first time in my aviation career (since I was 17) that I had been unemployed. I believe the rule in 14 CFR 65.91 it is disproportionately penalizing to not allow me to test. I have the years, skills and experience to continue holding the Inspection Authorization.

It would not be unusual for the FAA to grant this exemption. The FAA has allowed many exemptions to the 14 CFRs. One example - Pilots have been challenged by COVID restrictions and unable to keep required medicals, check rides and check airmen certifications/authorizations current. The FAA has granted these exemptions for pilots. Within 14 CFR part 65 there are provisions for an IA that does not meet currency requirements in the first year to take an oral exam and become current for the second year. I am requesting that the FAA allow an Aviation Safety Inspector within the Juneau FSDO to approve me to take the Inspection Authorization test, not to renew the Authorization.

The aviation world has seen a hard downturn in the number of able, and willing to work, 14 CFR part 65 airmen, especially during this time of COVID. I have been recruiting for more airframe and power plant mechanics at Taquan Air, not one applicant has an Inspection Authorization. It can be very challenging to get mechanics especially with an IA to come live and work in remote Alaska. At Taquan we conduct maintenance under 14 CFR 135.411(a)(1) and perform 100 hour and annual inspections on our De Havilland fleet of aircraft. We are in the middle of performing many major repairs and Annual inspections on our fleet of 7 De Havilland DHC-2 and 3 DHC-3 float equipped aircraft. Recently the past Director of Maintenance quit working for Taquan Air, leaving us with one Airframe and Power Plant mechanic with an Inspection Authorization. If I am granted the opportunity to test, Taquan Air will have a second qualified IA on staff, helping relieve the large work load on the only remaining IA holder. Allowing me to test for the IA would provide better coverage for inspections and repairs within our fleet. Having my IA will reduce the large workload on the current IA thus reducing the possibility overloading him, possibly missing items and or wearing him out to where he moves to a different company. I feel this would also improve the quality of our aircraft Annual inspections. Having another IA at Taquan Air is in the best interest of the flying public in order to provide the highest level of aircraft maintenance. I do not see any negative effect on the flying public if this were to be allowed, only positive outcomes. I believe it's what's best for the FAA and the industry and Taquan Air.

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Summary:

I am seeking an exemption to 14 CFR part 65.91(c)(2). I lost my inspection authorization (IA) due to a covid lay off that put me on unemployment for 6 months during the March renewal period. I was intelligible to renew due to being inactive for 6 months. This inactivity fell within the most recent 2 out of the 3 year need time frame for eligibility. I have been current for two and a half years out of the last three years. I had held the IA for 16 years prior to this lay off. I am requesting the FAA allow me to retest and once again become an IA holder in order to provide my employer with a second airframe and power plant mechanic that can perform the needed inspections and repairs. I feel this will better help improve aviation maintenance in my community without any negative effects.

You careful consideration would be greatly appreciated.

A handwritten signature in black ink, appearing to read 'Matt S. Fisher', with a stylized flourish at the end.

Matt S. Fisher
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